

Affidavit of Deborah F. Wright

Before me, the undersigned authority, on this day personally appeared the undersigned affiant, Deborah F. Wright., who being by me duly sworn, upon oath stated:

1. My name is Deborah F. Wright. I am over eighteen years of age, I have never been convicted of a felony or other crime, I am of sound mind, and I am fully capable of making this affidavit. I have personal knowledge of the facts stated herein, which are all true and correct.
2. **Education.** I have a B.A. from Baylor University, a M.ED. from Stephen F. Austin State University with mid-management certification and completed the counseling certification program at Sam Houston State University . I hold a lifetime certificate in school counseling for grades K - 12.
3. **Work Experience.** I have worked as a Mitigation Specialist in Texas capital murder cases from 2005 to the present. My work on capital trial teams involves a strong emphasis on gathering and interpreting records and conducting client and family interviews. I also assist my husband in his attorney practice devoted to capital defense of death row inmates. I reside in Huntsville, Texas
4. I have worked in both public education at various levels and adult education at the Windham School District which serves inmates in the Texas Department of Criminal Justice. I retired from the Windham School District where I served as the Counselor Trainer for all prison schools and state jails in the state of Texas from 2004 - 2005. My job duties included not only training all new principals and counselors, but also training school employees on administration of the Texas Adult Basic Education (TABE) Test, GED, and ALAS for offenders. I was responsible for overseeing all testing and answering test related questions for prison and state jail schools. In addition, I was responsible for identifying all offenders under the age of twenty-one and those needing Special Education services or to be transferred to other units due to handicapping conditions. I was also responsible for visiting unit schools to assist in administration of policy and conduct staff development.

5. Prior to that, I worked as a Vocational Counselor at the Estelle Unit, Huntsville, Texas from 2001 to 2004, where my responsibilities included placing offenders at both the Estelle Unit and Gateway Substance Abuse Facility in appropriate literacy classes and/or trades . In addition to testing, I oversaw the needs of the Special Education Department and the Vocational Department. I investigated cases dealing with students. I was a member of the weekly Individual Treatment Plan (ITP) Committee and Unit Orientation, LPAC Committee and ARDS, in addition to Unit Classification Committee (UCC) and New Officer Training Orientation as needed. I also conducted numerous tours for visiting dignitaries and school groups.
6. In 2000 - 2001, I worked as an Elementary Guidance Counselor at A.R. Turner in Willis, Texas for students grades K-4. I provided both individual and group counseling as needed. This campus included an Adaptive Behavior Unit, which included students in the district who were autistic and emotionally disturbed. I also served on the District and Region 6 Crisis Intervention Team.
7. From 1995 to 2000, I was an Academic School Counselor at Livingston High School in Livingston, Texas.
8. From 1975 to 1995, I taught school in the public schools of Livingston Independent School District. I started at the junior high school, and served there until 1978, when I moved to the high school, where I taught English and Journalism.
9. **Continuing Education in Capital Mitigation.** My ongoing training for my mitigation work involves attending seminars dealing with issues pertaining capital defense mitigation issues, mental health and forensics. This year I have attended the following seminars: February 2010 - "Capital Case Defense Seminar" sponsored for California Attorneys for Criminal Justice and California Public Defender Service, Monterey, CA; "Capital Trial and Habeas Seminar" sponsored by Texas Criminal Defense Lawyer Association, Austin, TX; April 2010 - "7th National Seminar on the Development and Integration of Mitigation Evidence in Capital Cases" sponsored by the Habeas Assistance and Training Counsel, through the Administrative Office of U.S. Courts' (AO) Office of Defender Services

Training Branch, Seattle, WA; June 2010 - "The Capital Aggravator: Death of a Child Under Age 6" sponsored by the Center for American and International Law, Houston, TX. I have attended various other seminars since 2005. In June 2006, the *Capital Litigation Update*, Vol. 8, No. 17, published "Prison Records for Death Row Clients" which I wrote.

10. **Investigation and Observations in This Case.** At the request of my husband, John E. Wright, one of Robert Leslie Roberson's federal habeas lawyers, I traveled to Parker County on Tuesday, August 17, 2010. When I arrived, I visited with Frances Vick in her yard in Springtown, Texas near Weatherford. Mrs. Vick is the maternal aunt of Robert Roberson.
11. Mrs. Vick is the oldest sibling of Mr. Robert Leslie Roberson's mother, Carolyn Roberson, and was suggested by Carolyn Roberson as a family member who could provide additional information about her family history.
12. I approached Mrs. Vick's residence on Tuesday evening, August 17 at 7:00 p.m. Located in a curve of a narrow rural road, the residence consisted of two older, long, narrow mobile homes with a smaller, older travel trailer all pulled into a triangular pattern with a chrome dinette table and four chair placed outside in the center on a barren area covered with sand. On the outer right side of the area, two benches and a small table were located under a shade tree near the door of one of the larger mobile homes. As I exited my car, a young woman and man leaving the older mobile home to my right, told me that Mrs. Vick, referred to as "Granny" by the young woman, lived in the smaller trailer and called out to her that someone was here to see her.
13. Upon my initial approach, Frances Vick did acknowledge who she was when asked; however, she denied knowing anyone named Carolyn Roberson or Robert Roberson. As I continued to gently probe with questions related to her sister, Carolyn, and her nephew, Robert, she finally admitted that she did know them. Frances Vick said that she would talk to me, but she would not sign a statement and definitely did not want to testify on her nephew's behalf.
14. She had not seen Carolyn Roberson in about ten years and was very reluctant about divulging information. The majority of my questions were

responded to by the question, “Didn’t Carolyn tell you?” or “What did Carolyn say?” When told that Carolyn Roberson had suggested that she would be able to provide the federal habeas defense team helpful family information, she did agree that they had been close years ago.

15. Mrs. Vick’s daughter, Tanya McClaren, named after country singer Tanya Tucker, emerged from her trailer house, sat on the steps outside her front door and provided occasional comments to the conversation. Frances Vick stated that both her daughter Tanya and her granddaughter are bipolar. While Tanya McClaren admitted that she had mental health problems for which she took medication, she also stated that she would not “go to court for Bobby” and “ain’t going to sign nothing” for access to her medical records. Tanya used “Bobby” as a nickname for Robert Leslie Roberson.
16. In my conversation with Frances Vick and Tanya McClaren, I gathered from them the items of information about their family history set out in the paragraphs below.
17. The children of Grady and Ruby Blackmon are: Frances, Lester, Carolyn, Roy Lee, David, Wanda, Bonnie, Darrell, Daniel, twins - Coleta and Oleta, and James.
18. Their mother, Ruby Blackmon, the maternal grandmother of Robert Leslie Roberson, had died about nine years before their father. Frances Vick and her daughter both agreed that Ruby Blackmon, who was bipolar and manic depressive, received medication from the Texas Department of Mental Health and Mental Retardation.
19. Frances Blackmon Vick is the oldest of fifteen children born to Grady and Ruby Blackmon. She was born in July 1942. Including Frances, twelve of the children survived. She is a cancer survivor.
20. Carolyn Roberson, was the third child born to the Blackmons. Frances Vick described her as a homebody when young. She stated that Carolyn met her husband, Leslie, and moved to East Texas. She said that she was not around her sister when she was pregnant with Robert and had no

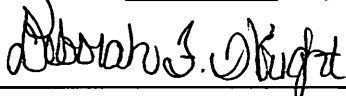
recollection of the pregnancy. Mrs. Vick's daughter, Tanya McClaren, said "All of Carolyn's children have problems." For example, Frances recalled that Bobby (Robert Leslie Roberson) wet the bed for a long time. Tanya said, "Bill, John and Ramona have problems."

21. Roy Lee Blackmon had mental problems. He died about ten years ago, which was about a year after the death of Grady, their father. Roy Lee was the maternal uncle of Robert Leslie Roberson.
22. Wanda's daughter is schizophrenic and her son has mental health problems. At this time, Wanda, another maternal aunt of Robert Leslie Roberson, is suffering from both brain cancer and breast cancer. Mrs. Vick said that she would place a call to Wanda and ask if she felt like speaking to me the following day. Tanya said that she knew her Aunt Wanda wrote to her cousin Bobby (Robert Leslie Roberson) and sent him money.
23. Frances Vick said that Bonnie, an aunt of Robert Leslie Roberson, lives in Weatherford area. Frances Vick and her daughter exchanged glances when Frances expressed her surprise that Carolyn did not provide this information. Frances and her daughter agree that Bonnie and her children are on medication for mental health problems. Bonnie moved to California at one time and is now back in Texas. Frances also said that her sisters Carolyn and Bonnie were close. Bonnie has visited Bobby (Robert Leslie Roberson) in prison.
24. James Blackmon is the youngest child born to Grady and Ruby Blackmon. Mrs. Vick and her daughter report that he and his son both have mental problems. James has panic attacks and his son takes medication for mental health problems.
25. Frances Vick stated that Bobby (Robert Leslie Roberson) might be bi-polar and her daughter Tanya agreed. Tanya said that she knew Bobby had done some time in jail. Both women quizzed me about the criminal justice process and where Robert Leslie Roberson is in the process.
26. Mrs. Vick and her daughter were very cautious when they spoke with me. For example, they did not provide me with the surnames for the women of

the family and would not give me phone numbers for family members. The interview was interrupted numerous times as young men and women walked through the area where we were sitting. Also, several times vehicles pulled up on the side of the road and young men asked for people housed in the other trailer houses. At one point an arguing couple emerged from the trailer house to the right. Another time a young man, expressed his unhappiness with his supper not being ready and got on a four wheeler and said he would go get a sausage on a stick for supper. After a fight between two cats in the area where the interview was being conducted, the interview was concluded.

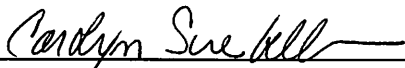
27. Based on what I learned from my visit with Frances Vick and Tanya McClaren, I believe that Robert Leslie Roberson has likely inherited a significant predisposition toward poor mental health.
28. Frances and Tanya told me that they had not been contacted by anyone on Robert Leslie Roberson's capital murder defense team. They both expressed a desire not to come to court and testify about Robert Leslie Roberson, but I did not see any physical or mental impairments that would excuse them from honoring a subpoena to come to court in Anderson County, Texas if one were served on them.
29. This statement completes my affidavit.

Signed this 9th day of September, 2010.



Deborah F. Wright

SUBSCRIBED AND SWORN TO this 9th day of September, 2010.



Notary Public, State of Texas

